

**BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001**

Nooksack Post Office,)
Nooksack, Washington 98276)
-----) DOCKET NO. A2011-17

**MOTION OF THE PETITIONER, CITY OF NOOKSACK, FOR
LATE ACCEPTANCE OF THE PETITIONER'S FORM 61
OR INITIAL BRIEF IN SUPPORT OF THE PETITION**

(June 10, 2011)

The Petitioner, the City of Nooksack, respectfully moves for late acceptance of its Form 61 or Initial Brief in Support of the Petition such that the Initial Brief shall be filed no later than 20 days following the date to which the Postal Service files the Administrative Record in this appeal.


This motion is based on the following grounds:

1. Commission Rule 3001.16;
2. In the May 19, 2011 Notice and Order Accepting Appeal and Establishing Procedural Schedule the Postal Regulatory Commission set forth a procedural schedule requiring the Postal Service to file the Administrative Record

in this Appeal no later than May 31, 2011. To date the Postal Service has yet to file the Administrative Record. Without the Administrative Record the Petitioner is precluded from filing its Initial Brief in Support of the Petition to the extent that the Petitioner has no administrative record upon which to argue its appeal. Further, this motion can be granted, and assuming the Administrative Record is filed promptly a decision by the Commission can still be made within the 120 day decisional schedule;

3. The record and files herein.

Respectfully submitted this 10 day of June, 2011.



JAMES ACKERMAN, Mayor,
City of Nooksack